

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE PETROBRAS SECURITIES LITIGATION

Case No. 14-cv-9662 (JSR)

CLASS REPRESENTATIVES' SUBMISSION REGARDING CORNELL UNIVERSITY'S
MOTION TO INTERVENE AND FOR AN ORDER UNDER 28 U.S.C. § 1782
AUTHORIZING DISCOVERY FOR USE IN A FOREIGN PROCEEDING, OR IN THE
ALTERNATIVE, AN ORDER UNSEALING THE SUMMARY JUDGMENT PAPERS AND
SUPPORTING DOCUMENTS THAT WERE FILED UNDER SEAL IN THIS CASE

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In connection with Cornell University's motion to intervene and for an order under 28 USC § 1782 authorizing discovery for use in a foreign proceeding or, in the alternative, an order unsealing judicial documents (Dkt. No. 920), Class Representatives Universities Superannuation Scheme, North Carolina Department of State Treasurer, and Employees' Retirement System of the State of Hawaii ("Class Representatives") submit this response to the Court's request on July 12, 2019 for all parties' view on the possibility of the Court unsealing any documents now under seal that were produced by Petróleo Brasileiro S.A. – Petrobras ("Petrobras"), solely for Cornell University's use in the CAM arbitration, but remaining subject to the existing protective order for all other purposes. Class Representatives take no position as to the discovery sought directly from Petrobras.

Dated: July 22, 2019

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/s/ Jeremy A. Lieberman

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CERTIFICATE OF SERVICE

I hereby certify that on July 22, 2019, a copy of the foregoing was filed electronically. Notice of this filing will be sent by e-mail to all parties by operation of the Court's electronic filing system as indicated on the Notice of Electronic Filing. Parties may access this filing through the Court's CM/ECF System.

/s/ *Jeremy A. Lieberman*
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